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Attorneys for Defendant HSBC Bank USA, NA

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

JUSTIN JAMES AND NICOLE JAMES;

Plaintiffs

v.

FREMONT REORGANIZING COMPANY,  
FKA FREMONT INVESTMENT & LOAN  
COMPANY; BRIDGE CAPITAL  
CORPORATION; HSBC BANK USA, NA;

Defendants.

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Case No. 3:08-CV-397-BR

DEFENDANT HSBC BANK USA, NA's  
FIRST UNOPPOSED MOTION TO  
EXTEND DISPOSITIVE MOTION &  
OTHER CASE MANAGEMENT  
DEADLINES

**I. LR 7.1 CERTIFICATION**

Pursuant to L.R. 7.1(a)(1)(A), HSBC's counsel has conferred with counsel for Plaintiffs and Co-Defendants, and they consent to this motion.

**II. MOTION**

Pursuant to FRCP 6(b), defendant HSBC respectfully moves the Court for a 30-day extension of the remaining case management deadlines established by the Court, including the dispositive motion deadline (currently, April 5, 2010).

The reasons for this motion are as follows: (1) Defendants need additional time to finalize affidavits of witnesses, due to vacation and travel schedules; (2) the parties are

attempting to limit the issues for summary judgment, and need additional time to confer; and, (3) the parties are discussing settlement. *See* Decl. of Thomas.

Accordingly, the following new case management deadlines are requested:

Joint Alternate Dispute Resolution Report: 5/5/2010

Dispositive Motions: 5/5/2010

Dispositive Motion Responses: 5/26/2010

Dispositive Motion Replies: 6/10/2010

This Motion is brought in good faith and not for purposes of delay.

DATED this 2nd day of April, 2010.

**ROUTH CRABTREE OLSEN, P.C.**

By /s/ John M. Thomas

John M. Thomas, OSB #024691

Attorneys for HSBC

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CERTIFICATE OF SERVICE

I hereby certify that I served the forgoing DEFENDANT HSBC BANK USA, NA's FIRST UNOPPOSED MOTION TO EXTEND DISPOSITIVE MOTION & OTHER CASE MANAGEMENT DEADLINES and DECLARATION OF JOHN THOMAS to the following parties on April 2nd, 2010 via CM/ECF:

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Of Attorneys for Defendant Fremont Reorganizing Corporation

DATED this 2nd day of April, 2010.

By /s/ John M. Thomas  
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